

UNITED STATES DISTRICT COURT

for the
Eastern District of Missouri

FILED

OCT 16 2013

U. S. DISTRICT COURT
E. DIST. OF MO.
ST. LOUIS

In the Matter of the Search of

Acorn Fabric Care Systems, Inc. and Apex Laundry and Dry Cleaning Equipment both located at 11710 Lackland Industrial Drive, St. Louis, Missouri, 63146 which is further described as a multi-business building. The exterior of the building has a light brick bottom and a light stone top. The target location has a glass front door. To the right of the front door, on the glass window, in white letters is "APEX LAUNDRY EQ." On the door to the target location is "11710" in black numbers

Case No. 4:13 MJ 1214 TIA

APPLICATION FOR A SEARCH WARRANT

I, David Herr, a federal law enforcement officer or an attorney for the government request a search warrant and state under penalty of perjury that I have reason to believe that on the following property:

Acorn Fabric Care Systems, Inc. and Apex Laundry and Dry Cleaning Equipment both located at 11710 Lackland Industrial Drive, St. Louis, Missouri, 63146 which is further described as a multi-business building. The exterior of the building has a light brick bottom and a light stone top. The target location has a glass front door. To the right of the front door, on the glass window, in white letters is "APEX LAUNDRY EQ." On the door to the target location is "11710" in black numbers

located in the EASTERN District of MISSOURI, there is now concealed

SEE ATTACHED LIST

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Title 18, U.S.C. Section 2113

Offense Description

Bank Robbery

The application is based on these facts:

SEE ATTACHED AFFIDAVIT WHICH IS INCORPORATED HEREIN BY REFERENCE

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



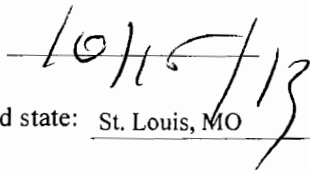
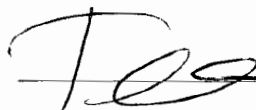
Applicant's signature

David Herr, Special Agent, Federal Bureau of Investigation

Printed name and title

Sworn to before me and signed in my presence.

Date:


City and state: St. Louis, MO


Judge's signature

Honorable Terry I. Adelman, U.S. Magistrate Judge

Printed name and title

AUSA: Thomas Rea

**AFFIDAVIT IN SUPPORT OF
FEDERAL SEARCH WARRANT**

Your affiant is David Herr, a Special Agent with the Federal Bureau of Investigation. Part of my duties and obligations is to investigate the robbery of institutions whose deposits are insured by the FDIC. A joint investigation is being conducted by the FBI, St. Charles County Sheriff's Department, Wright City Police Department, Creve Coeur Police Department, Warren County Sheriff's Department, and Missouri State Highway Patrol, among other agencies, into at least six attempted or actual bank robberies that occurred during the time period of October 2012 through September 2013.

Due to the similarity of these six incidents, each of them is now being investigated by the FBI in connection with other law enforcement agencies. The following information is known to me and/or other members of this investigation team:

I. THE BANK ROBBERIES.

A. September 20, 2013.

On September 20, 2013, at approximately 0920 hours, a witness (S.B.) was waiting outside of the First Bank, 11728 Bluff Road, Dutzow, Missouri (located in the Eastern District of Missouri). S.B. saw a white male later identified as Warren GLADDERS approach the front doors of the bank and pull a black ski mask over his face. Gladders was wearing blue jeans, tan boots, latex gloves, a red shirt and a blue jacket. Gladders withdrew a pistol from his pocket and entered the bank. S.B. contacted 911 and informed the dispatcher of the robbery. S.B. was able to see the robbery, as it occurred, through a bank window.

Gladders was holding a small framed black revolver when he entered the bank lobby. Gladders announced "You know what this is" and approached the victim teller with the gun displayed. Gladders was carrying a black mesh bag. The victim teller provided Gladders with \$667.00, including the bait bills (one 100 dollar bill and five 20 dollar bills), from her teller drawer. Gladders indicated to the victim teller that he did not want any dye packs. Gladders then directed the victim teller to get the 50's and 100's from the vault. The victim teller retrieved the vault key and obtained \$35,000.00 in hundred dollar bills and \$8,000.00 in fifty dollar bills. Gladders directed the victim teller to "fan" out the money and then place the money in the black mesh bag. Gladders announced "Nobody move for 60 seconds or call the police or I will kill you." Gladders exited the bank. The amount of money taken by Gladders was approximately over \$43,000.00.

Another witness saw Gladders running from the bank and entering a white passenger vehicle. The witness was able to follow the vehicle for a short period of time, enabling the witness to obtain the first three digits of the vehicle's license plate. That information was relayed to 911 and then broadcast out over mutual law enforcement radio channels.

A short time later, a Missouri State Highway Patrol trooper noticed a vehicle matching the subject vehicle traveling in Saint Charles County, Missouri. The trooper activated his lights and pulled the vehicle over. As the trooper approached the vehicle, Gladders exited the white sedan, and immediately engaged the trooper with gunfire. The trooper was struck with a round in his body armor. The trooper returned fire striking Gladders. The firearm used by Gladders to shoot the trooper was seized. It was determined to be a Smith and Wesson, 32 caliber. This firearm is consistent with the firearm displayed by Gladders during the course of the bank robbery.

Gladders was arrested at the scene and confirmed to be Warren Gladders, date of birth: 03/18/1949; social security number: 489-52-4294; residence: 308 Schmidt Drive, Wentzville, Missouri. The vehicle, a 2008 Nissan Maxima, VIN #:1N4BA41E38C817406, was seized and towed to Troop C Headquarters, 891 Technology Drive, Weldon Spring, Missouri. A review of Missouri Department of Revenue records indicated that the vehicle was owned by Apex Laundry Equipment c/o Warren Gladders, 11710 Lackland Industrial, St. Louis, Missouri.

On September 20, 2013, the Missouri State Highway Patrol obtained and executed a state-level search warrant for Gladders' vehicle. During the search of the vehicle, the items relating to the September 20, 2013, bank robbery were located and seized. For example:

- A black "Missouri Tigers" mesh bag containing over \$43,000.00 -- including the bait bills provided to Gladders during the bank robbery.
- A piece of paper with three addresses written on it. The first address was "16415 Village Plaza View Dr. Wildwood 9:00 – 5:30 – 6:00 Fri." This address is a First National Bank branch. The second address was "12230 Manchester 5:30 – 6:00." This address is also a First National Bank branch. The third address was "669 N. New Ballas 9:00 – 6:00 Fri." (This address is a First National Bank believed to have been robbed by Gladders on or about January 4, 2013.)
- An AT&T Pantech cellular telephone.
- A sawed-off 20 gauge shotgun with a modified pistol grip. The shotgun was loaded with two 20 gauge rounds and was secreted in a tennis bag on the front floor board of the vehicle. The length of the barrel was approximately 16 inches.
- A letter written by Gladders referencing money problems, among other things.

The vehicle also contained items that, based upon this on-going investigation, link Gladders to at least five other actual or attempted bank robberies. For example:

- A pair of black sunglasses.
- A blue jacket with a light colored liner.

- White Reebok shoes.
- A black wig.
- Latex gloves.
- Brown work gloves.

Those five other actual or attempted bank robberies are described below.

B. October 3, 2012.

On or about October 03, 2012, it is believed that Gadders entered the Farmers and Merchant Bank in Wright City, Missouri (located in the Eastern District of Missouri). Gadders presented a demand note to the victim teller. Gadders was wearing a red ball cap, possibly with the letters "BC" on it (not recovered), black sunglasses (likely recovered in Gladders' vehicle), a navy blue jacket (likely recovered in Gladders' vehicle), a blue polo shirt (not recovered), blue jeans, and white tennis shoes (likely recovered in Gladders' vehicle). Gadders instructed the victim teller to "wait sixty seconds before you hit the alarm" (similar to the statement made by Gladders during the September 20, 2013 robbery of the First Bank, 11728 Bluff Road, Dutzow, Missouri ("Nobody move for 60 seconds or call the police or I will kill you.") The loss to the bank was over \$13,000.00.

C. December 18, 2012.

On or about December 18, 2012, it is believed that Gladders entered the Jonesburg State Bank, 110 First Street, Jonesburg, Missouri (located in the Eastern District of Missouri). Gladders presented a demand note to the victim teller. Gladders indicated, "I am armed. You know what to do." Prior to receiving any money, another bank employee approached Gladders and asked Gladders to leave the bank, which he did. Gladders was seen entering a white vehicle and departing the area (Gladders was arrested on September 20, 2013, in a white 2008 Nissan). Gladders was wearing a red ball cap with letters or an emblem on the front (not recovered, but possibly the same hat worn during the October 3, 2012 robbery), a black wig (likely recovered in Gladders' vehicle), black sunglasses (likely recovered in Gladders' vehicle), a blue jacket (likely recovered in Gladders' vehicle) and Gladders was carrying a blue bank deposit bag (not recovered, but similar to the bag used during the August 2, 2013 robbery discussed below). There was no loss to the bank.

D. January 4, 2013.

On or about January 4, 2013, Gladders entered the First National Bank, 669 N. New Ballas, Creve Coeur, Missouri (located in the Eastern District of Missouri). (This bank address was listed on a piece of paper recovered in Gladders' vehicle.) Gladders was armed with a short barrel black or blue revolver with a brown handle (consistent with the

revolver possessed by Gladders during the September 20, 2013, robbery and shooting of the trooper and recovered by law enforcement). Gladders announced the robbery verbally and asked for the "50's and 100's" (similar to Gladders' demand during the September 20, 2013 robbery). Gladders was wearing a ski mask (likely recovered in Gladders' vehicle), black sunglasses (likely recovered in Gladders' vehicle), a blue jacket with light colored liner (likely recovered in Gladders' vehicle), and latex gloves (consistent with those recovered in Gladders' vehicle). The loss to the bank was approximately \$25,000.00.

E. June 7, 2013.

On or about June 7, 2013, Gladders entered the Reliance Bank, 9769 Olive Blvd, Creve Coeur, Missouri (located in the Eastern District of Missouri). Gladders was armed with a short barrel black revolver (consistent with the revolver possessed by Gladders during the September 20, 2013, robbery and shooting of the trooper and recovered by law enforcement). Gladders announced the robbery verbally. Gladders was wearing a tan ball cap (not recovered), black sunglasses (likely recovered in Gladders' vehicle), holding a red and black scarf with his left hand and covering his face (not recovered, but similar to scarf used during the August 2, 2103 robbery discussed below), a blue shirt (not recovered), white shoes (likely recovered in Gladders' vehicle), and brown work gloves (likely recovered in Gladders' vehicle). The loss to the bank was over \$7,000.00.

F. August 2, 2013.

On or about August 2, 2013, Gladders entered the First National Bank, 800 O'Fallon Road, Weldon Spring, Missouri (located in the Eastern District of Missouri). Gladders was armed with a short barrel black revolver (consistent with the revolver possessed by Gladders during the September 20, 2013, robbery and shooting of the trooper and recovered by law enforcement). Gladders announced the robbery verbally. Gladders was wearing a blue ball cap with red trim on the bill (not recovered), black sunglasses (likely recovered in Gladders' vehicle), holding a red and black scarf, with his left hand, covering his face (not recovered, but similar to June 7, 2013 robbery discussed above), a blue colored shirt, white shoes (likely recovered in Gladders' vehicle), brown work gloves (likely recovered in Gladders' vehicle) and Gladders was carrying a blue bank deposit bag (not recovered, but similar to the December 18, 2012 attempted robbery discussed above). The loss to the bank was over \$5,000.00.

II. THE LOCATIONS AND ITEM TO BE SEARCHED.

As described above, this on-going investigation has linked Gladders to at least five other bank robberies and one attempted bank robbery in violation of, among other statutes, Title 18, United States Code, Section 2113. While certain evidence of Gladders' involvement in those incidents was recovered on September 20, 2013, other tangible items and potential evidence related to those additional robberies exists but has not yet been located and seized. That would include, but not necessarily be limited to: demand notes, firearm(s), ball caps, black sunglasses, jacket(s), shirt(s), blue jeans, white shoes, a black wig, a blue bank deposit bag, ski mask, gloves, scarves, and other articles of clothing or

accessories worn, all records of monetary transactions, computers or any items of communication equipment to show communication or research regarding the robberies, and United States currency.

Based upon experience, this affiant has probable cause to believe that an individual such as Gladders would store, maintain, or otherwise hide such items within areas of his personal control, such as a vehicle, residence, or business. Accordingly, this affiant seeks the issuance of federal search warrants directed to these areas as described below.

A. Gladders' Residence and Business.

Gladders resides at 308 Schmidt Drive, Wentzville, Missouri, 63385 which is further described as a one story ranch house. The house has brown siding and partial brick front. The house has a reddish colored front door. There is a black mailbox on a wooden post, near the street, to the right side of the driveway. Above the two car garage is a white rectangular sign with "308" in black numbers.

Per Missouri Secretary of State records, Gladders is the President of Acorn Fabric Care Systems, Inc. and Apex Laundry and Dry Cleaning Equipment both located at 11710 Lackland Industrial Drive, St. Louis, Missouri, 63146 which is further described as a multi-business building. The exterior of the building has a light brick bottom and a light stone top. The target location has a glass front door. To the right of the front door, on the glass window, in white letters is "APEX LAUNDRY EQ." On the door to the target location is "11710" in black numbers.

B. Gladders' Mobile Phone.

Likewise, on September 20, 2013, an AT&T Pantech cellular telephone was recovered from Gladders' vehicle. A true and accurate photograph of the subject telephone is attached hereto as Exhibit 1. This cellular telephone is currently in the possession of the Missouri State Highway Patrol. Because the mobile phone was located inside Gladders' personal vehicle, it is reasonable to believe that Gladders was using the cellular telephone during the time period of October 2012 through September 2013 to potentially communicate with other individuals in the course of and in furtherance of his illegal activity.

This affiant has probable cause to believe that, to the extent Gladders was working with other individuals, that the cellular phone contains valuable information relative to the identities and whereabouts of those individuals. To the extent Gladders was working alone, this affiant has probable cause to believe that the cellular phone contains valuable information relative to the location of Gladders prior to, during, and after each of the aforementioned incidents. The information contained in the cellular phones will allow investigators to obtain admissible evidence of Gladders' illegal activities and will help to explain the full nature and scope of the illegal activities involved. Such evidence includes, but is not limited to, phone numbers stored in the directory of the subject cellular phone, phone numbers stored in the memory logs of the subject cellular phone, which includes

calls made to and from the phone, and any voice mail messages or text messages stored in the phones. Accordingly, this affiant respectfully requests this Court to issue a federal warrant authorizing the search of the subject cellular phone for the following evidence:

1. All data and records related to violations of Title 18, United States Code, Section 2113 and/or the identities of individuals involved with violating the aforementioned federal laws including, but not limited to, the following:
 - subscriber information;
 - voice mail messages stored on the subject cellular phone;
 - lists or records of calls placed from subject cellular phone;
 - lists or records of calls received by subject cellular phone;
 - text messages stored in subject cellular phone;
 - text messages sent from subject cellular phone; contact lists (e.g., names, identifiers, addresses, telephone numbers, and similar information) stored in subject cellular phone.
2. Any indication of device numbers assigned to the subject cellular phone (e.g., removing the back of the phone to identify physical device numbers, apart from the cellular phone number itself).

* * *

4:13 MJ 1214 TIA

LIST OF ITEMS TO BE SEIZED

demand notes, firearm(s), ball caps, black sunglasses, jacket(s), shirt(s), blue jeans, white shoes, a black wig, a blue bank deposit bag, ski mask, gloves, scarves, and other articles of clothing or accessories worn, all records of monetary transactions, computers or any items of communication equipment to show communication or research regarding the robberies, and United States currency